

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

Case No. 22-CV-20712-RKA

PENINSULA PETROLEUM LIMITED,

Plaintiff,

v.

CI INTERNATIONAL FUELS, LLC,

Defendant.

/

JOINT MOTION FOR SUBSTITUTION OF COUNSEL

The undersigned hereby moves for substitution of counsel and agree that Lori Dilican, Esq., and Dilican Law Firm, P.A. shall be substituted for Defendant, CI INTERNATIONAL FUELS, LLC (“Defendant”), in place of Lori Dilican, Esq., as an associate of Sanchez Vadillo, LLP, and the Law office of Sanchez Vadillo, LLP, in this action and furthermore state as follows:

1. Lori Dilican, Esq., and Dilican Law Firm, P.A have been engaged by Defendant, CI INTERNATIONAL FUELS, LLC to assume legal representation of Defendant in this matter in place of Lori Dilican, Esq., as an associate of Sanchez Vadillo, LLP, and the Law office of Sanchez Vadillo, LLP.
2. Rule 2.505(e)(3), Fla. R. Jud. Admin. provides: "(e) Appearance of Attorney. An attorney may appear in a proceeding in any of the following ways: ... (3) *Order on Substitution of Counsel.* “Filing of a written order by the court, that reflects written consent of the client. The court may condition substitution of counsel upon payment of or grant of security for the substituted attorney's fees and expenses or upon such other terms as may be just.”"

3. A Stipulation for Substitution of Counsel and a consent from the Defendant has been executed and will be filed for the record simultaneously with this Motion (Exhibit "A").

4. The requested substitution will further the interests of justice and will not prejudice any party.

WHEREFORE, undersigned counsel respectfully requests an Order granting the Motion for Substitution of Counsel for Defendant and substituting Lori Dilican, Esq., and Dilican Law Firm, P.A. in place of Lori Dilican, Esq., as an associate of Sanchez Vadillo, LLP, and the Law office of Sanchez Vadillo, LLP.

Respectfully Submitted,

Sanchez Vadillo, LLP
3105 NW 107th Avenue, Suite 103
Doral, Florida 33172
Telephone: (305) 485-9700

By: /s/ Maria L. Larrabure
Maria L. Larrabure, Esq.
Fla. Bar. No. 86059
eservice: mlarrabure@svlawus.com

Respectfully Submitted,

Dilican Law Firm, P.A.
8050 SW 72nd Ave. Apt. No. 2307
Miami, FL 33143
Tel. No. (561) 951-9612

By: /s/ Lori Dilican, Esq.
Lori Dilican, Esq.
Florida Bar No. 1004723
E-mail: ldilican@dilicanlaw.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically filed and electronically furnished to all counsels for the parties via the CMECF E-Filing Portal on this 10th day of August, 2023.

By: /s/ Maria L. Larrabure, Esq.
Maria L. Larrabure, for the Firm
Florida Bar No. 86059
mlarrabure@svlawus.com

By: /s/ Lori Dilican, Esq.
Lori Dilican, Esq.
Florida Bar No. 1004723
ldilican@dilicanlaw.com

EXHIBIT “A”

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/

STIPULATION FOR SUBSTITUTION OF COUNSEL

IT IS HEREBY stipulated and agreed that Lori Dilican Esq., and Dilican Law Firm, P.A. shall be substituted for Lori Dilican, Esq. and the Law office of Sanchez Vadillo, LLP. Hereafter, all orders, pleadings, motions, memoranda, notices, correspondence, etc. for Defendants shall be directed to Lori Dilican, Esq., Dilican Law Firm, P.A., Primary email for service: ldilican@dilicanlaw.com.

The referenced parties further stipulate to the Court's entry of the proposed Order attached hereto as Exhibit "A" on Stipulation for Substitution of Counsel for Defendant, CI INTERNATIONAL FUELS, LLC.

Respectfully Submitted,

SANCHEZ VADILLO, LLP
3105 NW 107th Avenue, Suite 103
Doral, Florida 33172
Telephone: (305) 485-9700
Facsimile: (305) 436-0191

By: /s/ Maria L. Larrabure
Maria L. Larrabure, Esq.
Fla. Bar. No. 86059
eservice: mlarrabure@svlawus.com

**DEFENDANT, CI INTERNATIONAL FUELS, LLC'S CONSENT FOR
SUBSTITUTION OF COUNSEL**

Defendant, CI INTERNATIONAL FUELS, INC., consents for Lori Dilican, Esq., Sanchez Vadillo LLP, and all attorneys affiliated with the law firm, to withdraw as attorneys of record, and further consents that Lori Dilican, Esq., and Dilican Law Firm, P.A. be substituted as attorney of record and shall represent Defendant, CI INTERNATIONAL FUELS, INC., in all further proceedings in this case.

CI INTERNATIONAL FUELS, INC.

By:

JAIME OCHOA

Date